

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE AMERICAN INTERNATIONAL
GROUP, INC. SECURITIES LITIGATION

This Document Relates To: All Actions

x

:

:

:

:

:

:

:

x

ECF CASE

Master File No. 04 Civ. 8141 (DAB) (AJP)

Oral Argument Requested

**NOTICE OF LEAD PLAINTIFF'S MOTION
FOR APPROVAL OF PROPOSED SETTLEMENT WITH
DEFENDANT AMERICAN INTERNATIONAL GROUP, INC.**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 23 (a), (b)(3) and (e), the Court appointed Lead Plaintiff, the Ohio Public Employees Retirement System, State Teachers Retirement System of Ohio and Ohio Police & Fire Pension Fund, will move the Court on January 31, 2012, at 11:00 a.m., before the Honorable Deborah A. Batts at the U.S. Courthouse, 500 Pearl Street, New York, NY 10007 for orders: (a) granting final approval of the proposed Settlement; (c) granting certification of the Settlement Class; and (b) approving the Plan of Allocation.

PLEASE TAKE FURTHER NOTICE that in support of the motion, Lead Plaintiff submits and is filing herewith: Lead Plaintiff's Memorandum of Law in Support of its Motion for Approval of Proposed Settlement with Defendant American International Group, Inc., dated December 2, 2011, and the Declaration of Thomas A. Dubbs in Support of Proposed Class Settlement, Plan of Allocation and Award of Attorneys' Fees and Expenses, with annexed exhibits,

dated December 2, 2011. Proposed orders will be submitted with Lead Plaintiff's reply submission on or before January 13, 2012.

Dated: New York, New York
December 2, 2011

**MICHAEL DEWINE,
ATTORNEY GENERAL OF OHIO**

LABATON SUCHAROW LLP

Alan S. Kopit (Ohio Bar #0031965)
HAHN LOESER & PARKS LLP
200 Public Square, Suite 2800
Cleveland, Ohio 44114-2301
(216) 621-0150
(216) 274-2478 (fax)

*Special Counsel to the Attorney General of Ohio and the
Ohio State Funds and Lead Counsel for the Class*

By /s/Thomas A. Dubbs
Thomas A. Dubbs (TD 9658)
Louis Gottlieb (LG 9169)
Nicole M. Zeiss (NZ 3894)
Thomas G. Hoffman (TG 0330)
140 Broadway
New York, New York 10005
(212) 907-0700
(212) 818-0477 (fax)

*Lead Counsel for Lead Plaintiff Ohio State Funds and
Lead Counsel for the Class*